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Rachel Perillo

August 16, 2024

By ECF

The Honorable George B. Daniels
United States District Judge
Southern District of New York
500 Pearl Street
New York, New York 10007

Re: United States v. Canadell Reyes et al.,
Including HUGO DE LA CRUZ OBREGON
22 Cr. 258 (GBD)

SO ORDERED:


George B. Daniels, U.S.D.J.

Dated: AUG 19 2024

Dear Judge Daniels:

I am the attorney for Hugo De La Cruz Obregon, the defendant in the above-referenced case, having been assigned pursuant to the Criminal Justice Act. This letter is respectfully submitted to request that your Honor authorize the appointment of my associate, Rachel Perillo, Esq., as associate counsel in this matter to assist me in various aspects of the case which are described in further detail below.

Ms. Perillo is an associate at my law office and is admitted to practice before this Court. She regularly assists me and other partners in my law office in CJA cases and has been assigned as associate counsel in criminal matters in the Southern and Eastern Districts of New York. It is expected that her assistance will be needed in Mr. De La Cruz Obregon's case for various reasons. Specifically, this is a complex matter with charges of international drug trafficking and possession of firearms involving multiple defendants. The discovery is expected to be voluminous, and Ms. Perillo's assistance will be needed to help review these materials. Additionally, Mr. De La Cruz Obregon was extradited from Colombia and is detained at the Essex County Correctional Center in Newark, New Jersey. Ms. Perillo's assistance will be needed to meet with Mr. De La Cruz Obregon at the jail to review discovery and discuss his case. She will also be needed to assist in any legal research, the drafting of any pretrial motions or written submissions, and at trial, if necessary. Additionally, I am scheduled to have a medical procedure on August 20 that will require several weeks of recovery. Ms. Perillo's assistance would ensure continued attention to Mr. De La Cruz Obregon's case while I am out recovering.

Hon. George B. Daniels
August 16, 2024
Page Two

Finally, Ms. Perillo's assistance would be more cost-effective at the CJA associate rate of \$125.00 per hour, and her work would not be duplicative.

If the Court grants this application, it is respectfully requested that Ms. Perillo be approved at the CJA rate of \$125.00 per hour, nunc pro tunc to July 22, 2024.

The Court's time and attention to this matter is greatly appreciated.

Respectfully submitted,
/s/
Jeremy Schneider